



RIEMER | HESS LLC
ATTORNEYS AT LAW

275 MADISON AVENUE, 26TH FLOOR
NEW YORK, NEW YORK 10016
T 212.297.0700 F 212.297.0730
info@riemerhess.com | www.riemerhess.com

January 31, 2025

VIA ECF

Hon. John G. Koeltl, U.S.D.J.
U.S. District Court, S.D.N.Y.
500 Pearl Street
New York, NY 10007

**RE: *Thomas R. et al v. Hartford Life and Accident Ins. Co.*, 1:21-cv-1388-JGK
Letter Motion to File Joint Stipulation and Reply Brief with Redactions**

Judge Koeltl:

I am the attorney for the Plaintiffs, Thomas R. and Gino F., in the above captioned case. Pursuant to Your Order dated November 12, 2024 (ECF 86), Plaintiffs timely file their Reply Memorandum of Law in Support of Plaintiff's Motion for Attorneys' Fees and Costs and accompanying documents, herewith.

Plaintiffs hereby move to file a redacted version of their Reply Memorandum of Law in Support of Plaintiffs' Motion for Attorney's Fees and Costs with the language regarding the amount of the settlement redacted. Further, Plaintiffs hereby move to file a redacted version of a Joint Stipulation between the Parties.

Upon reaching a settlement in this case, the Parties mutually agreed that both the Settlement Agreement and the amount of the settlement would be kept confidential with a few limited exceptions. Specifically, the Parties agreed that Plaintiffs "may also disclose the amount of the settlement to the Court under seal with [Plaintiffs'] application for costs and attorneys' fees associated with the Lawsuit." Pursuant to this agreement between the Parties, Plaintiffs move to file a redacted version of their Reply Memorandum of Law in Support of Plaintiffs' Motion for Attorney's Fees and Costs with the language regarding the settlement amount redacted.

Further, during the course of the briefing on Plaintiffs' Motion for Attorneys' Fees and Costs, the Parties agreed to submit a Joint Stipulation to the Court regarding some of the terms in the Settlement Agreement. Pursuant to this agreement between the Parties, Plaintiffs move to file a redacted version of this Joint Stipulation with the only redaction pertaining to the terms of the otherwise confidential Settlement Agreement

Pursuant to Your Honor's Individual Rules, the Parties have met and conferred to narrow the scope of this request as much as possible. The requested redactions are narrowly tailored to serve the purpose of maintaining the confidentiality agreement in the Settlement Agreement.

Thank you for your time and attention to this matter.

Application granted,
except the Court sees no reason that
the Joint Stipulation, ECF Nos. 111 and 112,
should be signed by the Court. The Stipulation
is an agreement between the parties that the Court
will decide for what is worth. SO ordered
2/3/25 JMG/Keltl/USD

Respectfully Submitted,

/s/ Ryan J. McIntyre

Riemer Hess LLC

Attorneys for the Plaintiffs

275 Madison Ave., 26th Floor

New York, NY 10016

212-297-0700

rmcintyre@riemerhess.com

CERTIFICATE OF SERVICE

I, Ryan McIntyre, hereby certify that on January 31, 2025, I caused the Letter Motion to File Joint Stipulation and Reply Brief with Redactions to be electronically filed with the United States District Court for the Southern District of New York, 500 Pearl Street, New York, NY 10007, with an electronically filed copy delivered to Matthew Mazzola and Gregory Bennici at Robinson & Cole LLP, counsel for the Defendant, Hartford Life and Accident Insurance Company.

Dated: January 31, 2025

Respectfully Submitted,

By: /s/ Ryan J. McIntyre
Ryan J. McIntyre, Esq.
RIEMER HESS LLC
Attorneys for the Plaintiffs
275 Madison Ave., 26th Floor
New York, NY 10016
(212) 297-0700
rmcintyre@riemerhess.com